

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

**DEFENDANT VOICE SIGNAL TECHNOLOGIES, INC.'S MOTION FOR
RECONSIDERATION OF THE COURT'S MAY 2, 2006 ORDER GRANTING
SCANSOFT'S MOTION**

Voice Signal Technologies, Inc. (“Voice Signal”) hereby moves for reconsideration of the Court’s May 2, 2006 Order granting plaintiff ScanSoft’s Motion to Allow Its Independent Expert Access to VST’s First Year Source Code (The “ScanSoft Motion”).

The relief requested in the ScanSoft Motion - to allow ScanSoft's expert to review Voice Signal's source code - completely undermines the Neutral Expert Procedure and puts at risk Voice Signal's most valuable asset. The Court granted ScanSoft's Motion without the benefit of considering Voice Signal's Opposition. This Court should reconsider its May 2, 2006 in light of Voice Signal's Opposition and Memorandum in Support of this Motion, which are being filed under seal simultaneously herewith.

Respectfully submitted,

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Sarah Chapin Columbia

Robert S. Frank, Jr. (BBO No. 177240)
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Dated: May 4, 2006.

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal conferred with counsel for ScanSoft on May 4, 2006 in an effort to resolve the issues presented in this motion and that the parties were unable to reach an agreement.

/s/ Wendy S. Plotkin

Wendy S. Plotkin

CERTIFICATE OF SERVICE

I hereby certify as follows:

1. This document filed through the ECF system will be sent electronically to the registered participants in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 4, 2006.
2. On May 4, 2006, a true and correct copy of this document was served by hand to Rebecca L. Hanovice, Esq. of Bromberg & Sunstein LLP, 125 Summer Street, Boston, MA 0211.

/s/ Wendy S. Plotkin

Wendy S. Plotkin